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19 CHICAGO TITLE INSURANCE COMPANY and UNITED
20 TITLE OF NEVADA, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 DEUTSCHE BANK NATIONAL TRUST
COMPANY,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:20-CV-02268-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

(FIRST REQUEST)

COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and
United Title of Nevada, Inc. (“United Title”) (collectively “Defendants”) and plaintiff Deutsche
Bank National Trust Company (“Deutsche Bank”), by and through their respective attorneys of
record, which hereby agree and stipulate as follows:

1 1. On December 15, 2020 Deutsche Bank filed its complaint in the Eighth Judicial
2 District Court for the State of Nevada;

3 2. On December 15, 2020, Chicago Title removed the instant case to the United
4 States District Court for the State of Nevada (ECF No. 1);

5 3. On January 8, 2021, Deutsche Bank served its complaint on Chicago Title and
6 United Title;

7 4. Chicago Title's and United Title's respective responses to Deutsche Bank's
8 complaint are currently due on Friday, January 29, 2021;

9 5. Counsel for Defendants request a 31-day extension until Monday, March 1, 2021
10 for Defendants to file their respective responses to Deutsche Bank's complaint to afford
11 Defendants' counsel additional time to review and respond to Deutsche Bank's complaint.

12 6. Counsel for Deutsche Bank does not oppose the requested extension;

13 7. This is the first request for an extension made by counsel for Defendants, which is
14 made in good faith and not for the purposes of delay.

15 8. This stipulation is entered into without waiving any of Defendants' objections
16 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint is hereby extended through and including March 1, 2021.

3 Dated: January 27, 2021

SINCLAIR BRAUN LLP

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5 By: /s/-Kevin S. Sinclair
6 KEVIN S. SINCLAIR
7 Attorneys for Defendant
8 CHICAGO TITLE INSURANCE COMPANY
9 and UNITED TITLE OF NEVADA, INC.

10 Dated: January 27, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Darren T. Brenner
12 DARRENT T. BRENNER
13 Attorneys for Plaintiff
14 DEUTSCHE BANK NATIONAL TRUST
15 COMPANY

16 **IT IS SO ORDERED.**

17 Dated this 28th day of January, 2021.

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21 CAM FERENBACH
22 UNITED STATES MAGISTRATE JUDGE
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